

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**RESPONSES OF UNITED STATES POSTAL SERVICE TO QUESTIONS POSED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY
(July 13, 2012)**

The United States Postal Service hereby provides institutional responses to questions raised during the oral cross-examination of witness Day in this docket on July 11, 2012. Citations to questions are provided, with questions paraphrased and then followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie
Adriene M. Davis
James M. Mecone
Keith C. Nusbaum

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6525; Fax -5402

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/269 and 301 Please provide a date on which the Postal Service will provide the POStPlan customer survey and instructional memorandum to the Commission.

RESPONSE

The Postal Service intends to file with the Commission a draft of the customer survey by Tuesday, July 31, 2012 and a draft of the instructional memorandum by Friday, August 10, 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/309 Is the Postal Service able to provide the average salaries, by EAS level, for current OIC or PMRs acting in POSTPlan Offices?

RESPONSE

The Postal Service is unable to provide the requested information. The Postal Service maintains salary and benefit data based on employee grade level, not based on employee assignment. The salary and benefit data is not linked to the Post Office or facility in which the employee is acting. For example, the data provided in USPS-LR-N2012-2/6 represents the salary and benefit information for all EAS Level 16 and below Postmasters, not the salary and benefit information for all Postmasters working in EAS Level 16 and below Post Offices.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/304-5 and 323 Please explain the discrepancy between column W in Library Reference 1 and column I in Library Reference 2 (2011_CSV_Data).

RESPONSE

Please see the errata to the response to POIR No. 4, Question 5, filed concurrently. The response to POIR No. 4, Question 5 contained an error in that column W of USPS-LR-N2012-2/1 does not correspond with column I of 2011_CSV_Data.xls in USPS-LR-N2012-2/2. CSV does not include a calculation of Postmaster Admin time. As such, for offices using CSV, the Postmaster Admin time, column W on USPS-LR-N2012-2/1, will be 0. The Admin time in column I of 2011_CSV_Data.xls in USPS-LR-N2012-2/2 is included in the value of column X of USPS-LR-N2012-2/1.